



Indiana Department of Education
SUPPORTING STUDENT SUCCESS

April 15, 2010

Mr. Kevin Teasley, Superintendent
Fountain Square Academy #9480
333 North Pennsylvania – Suite 1000
Indianapolis, Indiana 46204

Dear Mr. Teasley:

On February 12, 2010, the Indiana Department of Education's (IDOE) Title I monitoring team commenced an on-site monitoring review of Fountain Square Academy's administration of Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the *No Child Left Behind Act* (NCLB). Enclosed is a report based upon this review.

Prior to, during, and following the on-site monitoring review, the IDOE team conducted a number of activities (described in the attached report) to verify compliance with 1) the programmatic requirements of Title I, Part A; and 2) the fiscal requirements that must be followed by recipients of Title I, Part A educational funds.

The enclosed report summarizes the results of our on-site monitoring review. **Within 30 business days of the date of this letter**, please submit a response, and where appropriate, further documentation. IDOE will review the documentation and determine if it is sufficient to remove or remedy identified compliance problems.

In all cases where there are findings of non-compliance, **Fountain Square Academy is responsible for taking appropriate action to remedy compliance deficiencies**. In some instances, this can occur immediately. In other instances, a longer-term solution may be necessary. Where longer-term measures are necessary, Fountain Square Academy must submit a specific detailed action plan with timelines and benchmarks for corrective action. IDOE will be happy to provide technical assistance as appropriate.

The IDOE team would like to thank you, Sena Jessen, Cindy Lauri, Mary Simons and Keena Foster for their work and assistance provided prior to and during the review in gathering materials and providing access to information in a timely manner.

We look forward to continued cooperation in working with you and your staff members on any follow-up activities and in assisting Fountain Square Academy with improving the delivery of Title I services.

Sincerely,

Teresa Neely, Coordinator
Office of Title I
Indiana Department of Education

cc: Sena Jessen, Title I Program Administrator
Fountain Square Academy #9480

Lee Ann Kwiatkowski, Director
Differentiated Learners Division
Indiana Department of Education

Indiana Department of Education Title I, Part A Monitoring

District: Fountain Square Academy
Monitoring Date: February 12, 2010
Monitoring Team: Teresa Neely, Liz Harmon, Sam Pierce

Background Information

The Indiana Department of Education (IDOE) commenced on-site monitoring of Fountain Square Academy on February 12, 2010. The purpose of this monitoring visit was to identify areas of strength, areas that need improvement, and areas of non-compliance with Title I, Part A and federal grants management (fiscal) requirements.

IDOE specifically monitored in the following areas:

Monitoring Topic	Statutory Citation
1) Compliance with professional qualification requirements for teachers and paraprofessionals	NCLB §1111(h)(6(A)) NCLB §1119(c)(1) NCLB §9101 (23)
2) Compliance with parental involvement requirements	NCLB §1118(a)-(h) NCLB §1111(c)(14) NCLB §1111(d) NCLB §1116(a)(1)(D) NCLB § 9101 (32)
3) Compliance with school improvement requirements	NCLB §1116(b) NCLB §1116(c) NCLB §1116(e)
4) Compliance with schoolwide program requirements	NCLB §1114
5) Compliance with targeted assistance program requirements	NCLB §1115
6) Compliance with statutory set-aside requirements	NCLB §1113 NCLB §1116 NCLB §1118
7) Compliance with supplement, not supplant requirements	NCLB §1120A
8) Compliance with financial management/procurement requirements	EDGAR §80.20 EDGAR §80.36
9) Compliance with compensation for	OMB Circular A-87, Attachment B,

personnel services requirements	Section 8
10) Compliance with complaint procedures	Subpart F—Complaint Procedure (CFR, Title 34)
11) Compliance with equipment and technology requirements	EDGAR §80.32 OMB Circular A-87

During the on-site visit, IDOE spent time interviewing staff from Fountain Square Academy.

IDOE reviewed documents, including school policies and procedures, school notices to parents, school plans, personnel information, budget documents, contracts, and expenditure reports.

Based on the above information, our report follows.

Monitoring Topic I: Compliance with NCLB Professional Qualification Requirements for Teachers and Paraprofessionals

Background:

IDOE interviewed the Title I Program Administrator. In addition, IDOE reviewed letters to personnel, and notices to parents.

Statutory Requirement: Professional qualifications requirements are contained in Sections 1111 and 1119 of Title I. In addition, “highly qualified” is defined in Section 9101(23) of the general provisions section of NCLB.

Areas of Compliance:

Instructional Paraprofessionals: Fountain Square Academy provided evidence that instructional paraprofessionals work under the direct supervision of a licensed teacher. The licensed teachers prepare the lessons and plan the activities the paraprofessionals carry out. The paraprofessionals work in close and frequent proximity to the licensed teachers.

Highly Qualified Instructional Paraprofessionals: Fountain Square Academy provided copies of transcripts and college diplomas demonstrating that all of the paraprofessionals are highly qualified.

Parents’ Right to Know Regarding Request for Teacher Qualifications: Fountain Square Academy provided evidence that the Parents’ Right-to-Know letters were mailed to all families in August 2009.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic I:

Highly Qualified for Core Academic Teachers: After reviewing licensure documentation it was discovered that three teachers did not meet the highly qualified requirement. (See Attachment E for Title II Report)

Required Action: Fountain Square Academy must ensure that all core academic subject teachers are highly qualified. Fountain Square Academy must submit a copy of the Transition to Teaching permit for Laura Hildenbrand, a copy of the emergency permit for Jane Bartsch, and a copy of the emergency permit for Valerie Mitchell by May 28th, 2010.

In addition, Fountain Square Academy must submit to the IDOE a plan for all core academic subject teachers to become highly qualified by amending the Title I, Part A grant funds to reserve 5 percent to support teachers in becoming highly qualified or by providing evidence that Title II, Part A funds will be used to support teachers in becoming highly qualified. If Fountain Square Academy does not reserve funds to support teachers in becoming highly qualified, the school must submit evidence that

non-highly qualified teachers will be reassigned to their licensure areas to meet the requirements for the 2010-2011 school year.

Parents' Right-To-Know Regarding Non-highly Qualified Teacher: Fountain Square Academy did not accurately report three teachers as non-highly qualified; therefore, no letters were sent to parents notifying them when their children are taught by teachers who are not highly qualified.

Required Action: Fountain Square Academy must ensure that the Parents' Right-to-Know letter notifying parents that their child was assigned to or taught for 4 or more consecutive weeks by a teacher in a core academic subject who is not highly qualified will be mailed to all parents. Fountain Square Academy must submit to the IDOE by May 28th, 2010 the letter and proof of mailing.

5% set-aside: Fountain Square Academy did not reserve 5 percent of its Title I allocation to support teachers in becoming highly qualified.

Required Action: Fountain Square Academy must reserve 5 percent of their total allocation in their Title I, Part A Application to support teachers in becoming highly qualified or provide evidence that Title II, Part A funds will be used to support teachers in becoming highly qualified. If Title II, Part A funds will not be used, Fountain Square Academy must submit an amendment to the Title I, Part A Application reserving 5 percent of the funds to support teachers in becoming highly qualified by April 23, 2010.

Monitoring Topic 2: Compliance with Parental Involvement Requirements

Background:

IDOE interviewed the Title I Program Administrator. In addition, IDOE reviewed parent policy, compacts, and other documentation provided prior to and during the on-site visit.

Statutory Requirement: Parental involvement requirements are contained throughout Title I, specifically in Sections 1111, 1116, and 1118. In addition, parental involvement is defined in Section 9101(23) of the general provisions section of NCLB.

Areas of Compliance:

Annual Meeting: Fountain Square Academy provided an agenda and sign-in sheets from the Annual Title I Meeting that was held on September 23, 2009.

Recommendation: In the future, Fountain Square Academy must hold the Annual Parent Meeting at two different times during the day to accommodate families with varied work schedules.

School Parental Involvement Policy: Fountain Square Academy provided a copy of the School Parental Involvement Policy with all of the required components. (See Attachment A)

School-Parent Compact: Fountain Square Academy provided a copy of the School-Parent Compact with all of the required components. (See Attachment B)

Parent Information Resource Center (PIRC): Fountain Square Academy provided copies of a newsletter notifying parents of the Parent Information Resource Center.

Building Schools' and Parents' Capacity: Fountain Square Academy provided evidence that efforts to build the Schools' and Parents' Capacity have been made. Based upon interviews with the staff, it was determined that parental involvement has been minimal and inconsistent.

Recommendation: Fountain Square Academy must research and implement additional parent involvement strategies beyond what is currently being done to ensure parents are taking a more active role in their children's education. Specific recommendations were discussed about how to ensure that new students and families are transitioned into Fountain Square Academy by coordinating with local elementary schools.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 2:

Meaningful Consultation: Although Fountain Square Academy was able to provide current parental involvement policies, the school was unable to demonstrate that parental input was included in the revision of the policies.

Required Action: Fountain Square Academy must ensure that parental input is included when annually revising the School-Parent Compact, the Parent Involvement Policy, and the Schoolwide/School Improvement Plan. In addition, Fountain Square Academy must submit to the IDOE a list of parents who participated in the revision of these policies by May 28, 2010.

Reviews Effectiveness of Parental Involvement Activities: Fountain Square Academy provided copies of parent surveys about the school; however there was no evidence that the effectiveness of Parental Involvement Activities were evaluated.

Required Action: Fountain Square Academy must submit to the IDOE by May 28, 2010 a plan for evaluating all Parental Involvement Activities in the future to ensure that activities are evaluated for effectiveness.

Monitoring Topic 3: Compliance with school improvement, corrective action, restructuring, and alternative governance requirements; including proper implementation of public school Choice and Supplemental Educational Services.

Background:

IDOE interviewed the Title I Program Administrator regarding School Improvement requirements.

Statutory Requirement: School improvement, corrective action, restructuring, and alternative governance requirements, including proper implementation of public school choice and supplemental educational services are contained in Section 1116. Depending on the number of years a school has not made adequate yearly progress (AYP), the school, district, and in certain cases state, must take certain actions.

Areas of Compliance:

School Improvement Letter: Fountain Square Academy was able to demonstrate that the school improvement letter was approved by the IDOE and mailed to all parents in June 2009. A copy of the approved letter informing parents that the school is identified for improvement and information explaining Choice was provided.

Eligibility Requirements for SES: Fountain Square Academy was able to provide data used to determine which students are eligible for Supplemental Educational Services. The school provided a list with free and reduced lunch data, along with a list of students who are considered “non-proficient” according to either ISTEP+ or NWEA test results.

Supplemental Educational Services Agreement: Fountain Square Academy provided copies of signed SES agreements between the school, the parents and the provider.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 3:

School Improvement Plan: Fountain Square Academy provided the IDOE with a copy of the NCLB School Improvement Plan that contained all components under Section 1116. However, the school could not produce evidence that the School Improvement Plan was developed in consultation with parents, school staff and outside experts. (See Attachment C)

Required Action: If it is determined with spring 2010 ISTEP+ test results that Fountain Square Academy is identified for School Improvement, the school must review and revise the current School Improvement Plan with parental input. These revisions, with documentation of parental input, must be completed within three months of being identified as a Title I School in Improvement and submitted to the IDOE for review.

Peer Review of School Improvement Plans: Fountain Square Academy did not provide evidence of a peer review process for the NCLB School Improvement Plan for a Title I school identified for improvement. (NCLB 1116 (b)(3)(E)(ii) states, "...within 45 days of receiving a school plan, the LEA shall promptly review the school plan")

Required Action: Fountain Square Academy must ensure that a peer review process is completed for the NCLB School Improvement Plan in the future. If it is determined with spring 2010 ISTEP + test results that Fountain Square Academy is identified as a Title I School in Improvement, the School Improvement Plan must be reviewed and revised within three months of being identified. Once the School Improvement Plan is written, a peer review of the School Improvement Plan must be conducted, and documented, within 45 days. Evidence of the Peer Review must be submitted to IDOE.

Tracking of Choice Transfers and Supplemental Educational Services (SES):

Fountain Square Academy could not provide evidence that the school tracks SES enrollment numbers and tracks the amount of funds being expended for each SES student, to ensure that the school is not paying for tutoring costs beyond the PPE amount.

Required Action: Fountain Square Academy must ensure that SES enrollment and funds are tracked for the 2009-2010 school year. Fountain Square Academy must ensure that a system is in place to verify student attendance. In addition, the school must ensure that tracking of how much the PPE each student has left after each invoicing period, tracking of how much the total contract amount the school has paid each provider, and overall how much of the school's SES funds have been expended on a regular basis. Fountain Square Academy must submit to the IDOE the SES tracking procedures for the 2009-2010 school year by May 28, 2010.

Monitoring Topic 4: Compliance with LEA Improvement Requirements

Not applicable to Fountain Square Academy

Monitoring Topic 5: Compliance with Schoolwide Program Requirements

Background:

IDOE interviewed the Title I Program Administrator regarding Schoolwide program requirements.

Statutory Requirement: The schoolwide program requirements are contained in Section 1114. In general, in an eligible schoolwide program school, federal, state, and local funds can be combined to upgrade the entire educational program (except Reading First funds). Unlike a targeted assistance school, where certain students must be identified for Title I services, in a schoolwide program school all students are considered to be eligible for services and the goal is to upgrade the entire educational program of the school. In addition, in a schoolwide school, schools are not required to maintain

separate fiscal records, by program, that identify activities supported with particular funds as long as the school maintains records that demonstrate that the Schoolwide program, as a whole, addresses the intent and purposes of each Federal program that was consolidated.

Areas of Compliance:

Implementation of Schoolwide Plan: Fountain Square Academy went through schoolwide planning with outside consultants during the 2007-2008 school year. The first year of schoolwide implementation was during the 2008-2009 school year. After interviews of current staff and a review of the Schoolwide Plan, Fountain Square Academy provided evidence that the Schoolwide Plan has been implemented in the school.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 5:

Schoolwide Program Plan: Fountain Square Academy submitted a copy of their current Schoolwide Plan. A thorough review of the Schoolwide Plan found that several of the required components were missing or incomplete. Fountain Square Academy was also not able to provide evidence that parents were involved in the review and revision of the Schoolwide Plan. (See Attachment D)

Required Action: Fountain Square Academy must revise their Schoolwide Plan with all required components. Specifically, components 3, 6, and 7 must be revised and submitted to the IDOE by May 28, 2010. In addition, evidence of parent input on the revisions must be submitted with the revised plan.

Use of Funds in Implementation of Schoolwide Plan: Based on a review of fiscal expenditures, two items were purchased with Title I funds that were not approved by the IDOE nor were the items identified as a need in the Schoolwide Plan. The purchase of "PE Equipment" in the amount of \$465.96 and the purchase of "Meal Time Software" in the amount of \$1,573.33 are not considered to be an upgrade to the entire educational program and were not approved expenditures in the Title I grant application.

Required Action: Fountain Square Academy must chargeback \$2,039.29 (total of two items above) into the Title I program and provide evidence that these expenditures are not charged to Title I. Please submit a copy of the claim voucher for the above items showing that funds were charged back to the general funds account. Evidence of the chargeback must be submitted to the IDOE by May 28, 2010.

Monitoring Topic 6: Compliance with Targeted Assistance Program Requirements

Not applicable to Fountain Square Academy

Monitoring Topic 7: Compliance with Supplement, not Supplant requirements

Background:

IDOE interviewed the Title I Program Administrator and the Treasurer regarding the Title I supplement, not supplant requirements. Fiscal documents for the 2008-2009 school year were reviewed during the onsite visit.

Statutory Requirement: Section 1120A requires Title I funds to supplement, not supplant non-Federal sources of funds.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 7:

No findings for Topic 7

Monitoring Topic 8: Compliance with Financial Management/Procurement Requirements

Background:

IDOE interviewed the Title I Program Administrator regarding the financial management system.

Regulatory Requirement: Section 80.20 (b)-(i) of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements financial management systems for non-State grantees (such as school districts).

Areas of Compliance:

Financial Management and Procurement: Fountain Square Academy was able to describe the detailed process of expenditures for Title I. This process includes ensuring that all items are approved prior to purchase by either the principal or the business manager at the GEO Foundation. Expenditures are appropriately coded to the correct program by the business manager.

Expenditures are Reasonable, Allocable, and Necessary: Based on the fiscal review, Fountain Square Academy provided evidence that Title I expenditures were reasonable, allocable and necessary.

Audit Findings: Fountain Square Academy did not have audit findings that needed to be addressed.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 8:

Internal Control: Fountain Square Academy was able to describe the detailed process of expenditures for Title I. One issue, however, in this process is that the Title I Program Administrator is not always the approving agent.

Required Action: Fountain Square Academy must ensure that all future Title I expenditures be approved by the Title I Program Administrator prior to purchase. In the case of Title I funds, it is the responsibility of the Program Administrator to oversee and ensure that expenditures are appropriate and have been previously approved by the IDOE in the Title I grant application.

Contracted Services: Fountain Square Academy provided signed contracts with Marian College for the 2008-2009 school year. However, they could not provide evidence of how the contracted services were monitored. Therefore, the school could not provide documentation that payments made were for actual services rendered.

Required Action: IDOE requires that future contracts be stated more specifically and explicitly to better meet the requirements of EDGAR. Furthermore, the school should maintain documentation that contracted services are performed according to the contracts.

Monitoring Topic 9: Compliance with Compensation for Personnel Services Requirements

Background:

IDOE interviewed the Title I Program Administrator regarding compensation for personnel services requirements.

Circular Requirement: OMB Circular A-87, Attachment B, Section 8 details the requirements for all compensation for personnel services supported with federal funds. This section includes the time distribution and semi-annual certification requirements.

Areas of Compliance:

Compensation for Personnel Services Requirements (Semi-annual Certification):

Fountain Square Academy was able to provide evidence that all staff funded solely with Title I funds completes a Semi-Annual Certification form at the end of each semester.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 9:

Compensation for Personnel Services Requirements (Program Activity

Reports/Time and Effort logs): Fountain Square Academy was able to provide completed Program Activity Reports/Time and Effort Logs for staff funded through Title I and other funds (split-funded personnel). A thorough review of the completed reports revealed that the time spent on Title I activities or general fund activities were not accurately recorded.

Required Action: Fountain Square Academy must submit corrected Program Activity Reports/Time and Effort logs for Paula Hunt and Fumihiko Yuki for the months of March and April 2010 by May 28, 2010.

Monitoring Topic 10: Compliance with Complaint Procedures

Background:

IDOE interviewed the Title I Program Administrator regarding the complaint process.

Regulatory Requirement: The SEA must adopt complaint procedures. The LEA must incorporate the elements required by NCLB for formal complaint procedures into local complaint procedure policies. The LEA must issue appropriate guidance to the schools. Complaint procedures are contained in Subpart F—Complaint Procedure (CFR, Title 34).

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 10:

Complaint Process: Fountain Square Academy was unable to produce evidence of a written complaint procedure policy or that a formal process for complaints has been established at the school or the GEO Foundation, the management organization for Fountain Square Academy.

Required Action: Fountain Square Academy must submit a written complaint policy to the IDOE by May 28, 2010.

Monitoring Topic 11: Compliance with Equipment and Technology Requirements (OMB A-87 and EDGAR 80.36)

Background:

IDOE interviewed the Title I Program Administrator regarding equipment acquired with Title I, Part A funds.

Regulatory Requirement: Section 80.36 of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements for the use, management and disposition of equipment acquired with federal funds by non-State grantees (such as school districts).

Areas of Compliance:

Inventory List/Identification of Equipment: Fountain Square Academy provided evidence of an equipment/technology inventory list that included the ten required components from EDGAR.

Recommendation: Fountain Square Academy must list each item on the inventory list individually. For example, the list currently shows “9 Overhead Projectors”. Please list each overhead projector, along with the serial number and location for each, on a separate line on the inventory sheets. The corrected inventory list must be submitted to the IDOE by May 28, 2010.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic II:

No findings for Topic II

School Parent Involvement Policy Checklist

Fountain Square Academy #9480 (Attachment A)

School Parental Involvement Policy: Section 1118 (b) Each Title I school shall jointly develop with, and distribute to, parents of participating children a written parental involvement policy, agreed on by such parents, that shall describe the means for carrying out the following requirements listed below.

Requirements of School Parental Involvement Policy	Compliance Status
1. Convened an annual meeting at a convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school's participation in Title I, Part A, and to explain the requirement of such and the right of the parents to be involved	In compliance
2. Offered a flexible number of meetings, such as meetings in the morning or evening, and may provide, with funds provided under this part, transportation, child care, or home visits, as such services relate to parental involvement	Recommend having at least two meetings scheduled (AM and PM)
3. Involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of programs under this part, including the planning, review, and improvement of the school parental involvement policy	In compliance Keep all documentation of parent input on policy revisions
4. Provide parents with: <ul style="list-style-type: none"> <input type="checkbox"/> Provide timely information about Title I programs <input type="checkbox"/> A description and explanation of the curriculum in use at the school, the forms of academic assessment used to measure student progress, and the proficiency levels students are expected to meet <input type="checkbox"/> If requested by parents, opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children, and respond to any such suggestions as soon as practicably possible 	In compliance
5. (SWP schools) If the schoolwide program plan under section 1114(b)(2) is not satisfactory to the parents of participating children, submit any parent comments on the plan when the school makes the plan available to the LEA	In compliance
6. Includes a School-Parent Compact (see checklist next page)	In compliance
7. Build the schools' and parents' capacity for strong parental involvement by: <ul style="list-style-type: none"> <input type="checkbox"/> Providing assistance to parents of children served as appropriate, in understanding such topics as the State's academic content standards and student academic achievement standards, and how to monitor a child's progress and work with educators to improve the achievement of their children <input type="checkbox"/> Providing materials and training to help parents work with their children to improve their children's achievement, such as literacy training and using technology, to foster parental involvement <input type="checkbox"/> Coordinating and integrating parent involvement programs and activities with Head Start, Early Reading First, Even Start, the Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children <input type="checkbox"/> Educate educators with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school <input type="checkbox"/> Ensure that information related to school and parent programs, meetings, and other activities, are sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand <input type="checkbox"/> Other reasonable support for parental involvement activities as parents may request 	In compliance

School – Parent Compact Checklist
Fountain Square Academy #9480
(Attachment B)

DIRECTIONS:

Review the School Parental Involvement Policy prior to mailing to the IDOE to ensure that all requirements listed below are met:

School-Parent Compacts: As a component of the school-level parental involvement policy, each Title I school shall jointly develop with parents for all children served, a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the State's high standards. Such compact shall:

School-Parent Compact shall include:	
1. Describe the school's responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the children served under this part to meet the State's student academic achievement standards, and the ways in which each parent will be responsible for supporting their children's learning, such as monitoring attendance, homework completion, and television watching; volunteering in their child's classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time; and	In compliance
2. Address the importance of communication between teachers and parents on an ongoing basis through, at a minimum: <ul style="list-style-type: none"><input type="checkbox"/> Parent-teacher conferences in elementary school, at least annually, during which the compact shall be discussed as the compact relates to the individual child's achievement<input type="checkbox"/> Frequent reports to parents on their children's progress<input type="checkbox"/> Reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities	In compliance

School Improvement Plan Checklist

Fountain Square Academy #9480 (Attachment C)

School Improvement Plan: [Sec. 1116 (b) (3) (A)] After identification as a school in improvement, each school identified as in improvement shall, not later than 3 months after being so identified, develop or revise a school plan in consultation with parents, school staff, the LEA, and outside experts, for approval by such LEA. The school plan shall cover a two year period and include:

*Consolidated plans are encouraged and accepted.

Ten Components of School Improvement Plan*:	Found on Page #:
1. Strategies based on scientifically based research strategies to strengthen core academic subjects that addresses the specific academic issues that caused the school to be identified for school improvement	In compliance
2. Policies and practices concerning core academic subjects that have the greatest likelihood that all groups of students will meet the proficient level on the ISTEP+	In compliance
3. Assurance that the school will spend not less than 10% each year to provide high quality professional development that: <ul style="list-style-type: none"> • Directly address the academic achievement problem that caused the school to be identified • Meets NCLB's professional development requirements • Provides increased opportunity for participating in professional development 	In compliance
4. Specifies how professional development funds will be used to remove the school from improvement status	In compliance
5. Annual measurable objectives for continuous and substantial progress by each group of students to meet proficient levels of achievement on the ISTEP+ (by 2013-2014)	In compliance
6. Documentation that written notice about the identification of a school in improvement was provided to the parents of each student enrolled in the school in a language parents can understand.	In compliance
7. Specifies the responsibilities of the school, the LEA, and the SEA including technical assistance to be provided	In compliance
8. Strategies to promote effective parental involvement in the school *Parent input is required on School Improvement Plans. Please keep evidence of parent input in the future.	In compliance
9. Activities before and after school, during summer, and during any extension of the school year	In compliance
10. Incorporates a teacher-mentoring program (in addition to any the LEA might offer for new teachers)	In compliance

Attachment D:



Title I Schoolwide Plan Checklist: Feedback for Fountain Square Academy

Components of a Schoolwide Plan*:	Found on Page #:
1. A comprehensive needs assessment of the whole school	In compliance
2. Implementation of schoolwide reform strategies that: <ul style="list-style-type: none"> <input type="checkbox"/> Provide opportunities for all children to meet proficient and advanced levels of student academic achievement <input type="checkbox"/> Use effective methods and instructional strategies that are based on scientifically based research that: <input type="checkbox"/> Strengthens the core academic program <input type="checkbox"/> Increases the amount of learning time <input type="checkbox"/> Includes strategies for serving underserved populations <input type="checkbox"/> Includes strategies to address the needs of all children in the school, but particularly low achieving children and those at risk of not meeting state standards <input type="checkbox"/> Address how the school will determine if those needs of the children have been met <input type="checkbox"/> Are consistent with and are designed to implement state and local improvement plans, if any 	In compliance
3. Highly qualified teachers in all core content area classes	Include how each teacher is HQ by indicating if passed the PRAXIS or earned 100 points on the HOSSE rubric
4. High quality and on-going professional development for teachers, principals, and paraprofessionals	In compliance
5. Strategies to attract high-quality, highly qualified teachers to this school	In compliance
6. Strategies to increase parental involvement, such as literary services	Do you have any type of classes/training for parents at the school?
6 a. Description how the school will provide individual academic assessment results to parents	In compliance
6 b. Strategies to involve parents in the planning, review, and improvement of the schoolwide plan	In compliance *Keep all documentation of parent input on Schoolwide Plan revisions
7. Plans for assisting preschool children in the transition from early childhood programs such as Head Start, Even Start, Early Reading First, or a state-run preschool program	How are you assisting incoming students? Do you partner with any elementary schools to help these students transition into the school?
8. Opportunities and expectations for teachers to be included in the decision making related to the use of academic assessment results leading to the improvement of student achievement	In compliance
9. Activities and programs at the school level to ensure that students having difficulty mastering proficient and advanced levels of the academic achievement are provided with effective, timely additional assistance	In compliance
10. Coordination and integration of federal, state and local funds; and resources such as in-kind services and program components	In compliance
10 a. A list of programs that will be consolidated under the schoolwide plan (if applicable)	In compliance

*Consolidated plans are encouraged and accepted

Attachment E:



Indiana Department of Education
SUPPORTING STUDENT SUCCESS

March 10, 2010

Ms. Keena Foster
Fountain Square Academy #9480
1615 S. Barth Avenue
Indianapolis, IN 46203

Dear Ms. Foster:

On February 12, 2010, the Indiana Department of Education's (IDOE) Title II Specialist commenced an on-site monitoring review of Fountain Square Academy's administration of Title II, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the *No Child Left Behind Act* (NCLB). Enclosed is a report based upon this review.

Prior to, during, and following the on-site monitoring review, the IDOE team conducted a number of activities to verify compliance with 1) the programmatic requirements of Title II, Part A; and 2) the fiscal requirements that must be followed by recipients of Title II, Part A educational funds.

The enclosed report summarizes the results of our on-site monitoring review. **Within 30 business days of the date of this letter**, please submit a response, and where appropriate, further documentation. IDOE will review the documentation and determine if it is sufficient to remove or remedy identified compliance problems.

In all cases where there are findings of non-compliance, **Fountain Square Academy is responsible for taking appropriate action to remedy compliance deficiencies**. In some instances, this can occur immediately. In other instances, a longer-term solution may be necessary. Where longer-term measures are necessary, Fountain Square Academy must submit a specific detailed action plan with timelines and benchmarks for corrective action. IDOE will be happy to provide technical assistance as appropriate.

The IDOE team would like to thank you and Sena Jessen for your work and assistance provided prior to and during the review in gathering materials and providing access to information in a timely manner.

We look forward to continued cooperation in working with you and your staff members on any follow-up activities and in assisting Fountain Square Academy with improving teacher quality through the use of Title II, Part A funds.

Sincerely,

Veronica Wilson
Title II Specialist
Indiana Department of Education

cc: Sena Jessen, HR Director
Fountain Square Academy

Liz Harmon, Title I Specialist
Indiana Department of Education

Pat Mapes, Director
Office of Educator Licensing and Development
Indiana Department of Education

Indiana Department of Education Title II, Part A Monitoring

District: Fountain Square Academy #9480

Monitoring Date: February 12, 2010

Monitoring Team: Veronica Wilson

Background Information

The Indiana Department of Education (IDOE) commenced on-site monitoring of Fountain Square Academy on February 12, 2010. The purpose of this monitoring visit was to identify areas of strength, areas that need improvement, and areas of non-compliance with Title II, Part A and federal grants management (fiscal) requirements.

IDOE specifically monitored in the following areas:

Monitoring Topic	Statutory Citation	Status
1) The SEA ensures that all teachers hired after the first day of the 2002-2003 school year to teach in Title I programs were highly qualified at the time of hire.	NCLB §1119(a)(1)	Findings
2) The SEA ensures that all teachers paid with Title II, Part A funds for class size reduction are highly qualified.	NCLB §2123(a)(2)(B)	Met Requirement
3) The SEA ensures that all LEAs that receive Title I funds notify parents of students in Title I schools of their right to request and receive information on the qualifications of their children's teachers.	NCLB §1111(h)(6)(A)	Met Requirement
4) The SEA ensures that all schools that receive Title I funds notify parents when their children are taught by teachers who are not highly qualified.	NCLB §1111(h)(6)(B)(ii)	Finding
5) The SEA ensures that LEA plans include an assurance that through the implementation of	NCLB §1112(c)(1)(L) NCLB §1111(b)(8)(c)	Finding

various strategies, poor and minority students are not taught at higher rates than other students by inexperienced, unqualified, or out-of-field teachers.		
6) The SEA has ensured that LEAs have completed assessments of local needs for professional development.	NCLB §2122(c)	Met Requirement
7) The SEA regularly and systematically monitors LEAs for compliance with Federal statutes and regulations, applicable State rules and policies, and the approved subgrantee application.	EDGAR §76.770 and §80.40(a).	Met Requirements
8) Show evidence that Title II, Part A funds are used to supplement, and not supplant, non-Federal funds.	NCLB §2123(b)	Met Requirement
9) If the district has non-highly qualified teachers, what is the LEA doing to assist those teachers in becoming highly qualified, including teachers on emergency permits?	NCLB §2123(b)	Finding
10) Show evidence that the district has evaluated the effectiveness of Title II, Part A activities and used that evaluation in making determinations about future use of funds.	NCLB §2123(b)	Met Requirement

Monitoring Topic 1:

LEA ensures that all teachers hired after the first day of the 2002-2003 school year to teach in Title I programs were highly qualified at the time of hire.

Citation: NCLB §1119(a)(1)

Finding 2: All HQ documentation is not currently kept at the school.

Corrective Action: The LEA should keep copies of all required HQ documentation at the school. Please see [Acceptable Documentation](#) for more guidance.

Finding 2: Three non-HQT were discovered upon review of licensure.

Corrective Action: Laura Hildenbrand requires a Transition to Teaching permit to be considered HQ. Jane Bartsch requires an Emergency Permit for High School Language Arts to comply with Indiana licensing regulations, but will not be HQ on an Emergency Permit; full licensure will be required before HQ requirements can be met. Valerie Mitchell requires an Emergency Permit for Middle School Language Arts to comply with Indiana licensing regulations, but will not be HQ on an Emergency Permit; full licensure will be required before HQ requirements can be met. Teachers on Emergency Permits need to be moved to full licensure or re-assigned according to their licensure to meet HQ requirements for the 2010-11 school year.

Monitoring Topic 4:

The SEA ensures that all schools that receive Title I funds notify parents when their children are taught by teachers who are not highly qualified.

Citation: NCLB §1111(h)(6)(B)(ii)

Finding: The LEA did not accurately report three teachers as non-HQ; therefore, no letters were sent to parents notifying them when their children are taught by teachers who are not HQ.

Corrective Action: The LEA should immediately notify parents of students instructed by non-HQT. In the case of Laura Hildenbrand, a letter should be sent now informing parents of her non-HQ status. A second letter may be sent when she achieves HQ status.

Monitoring Topic 5:

The SEA ensures that LEA plans include an assurance that through the implementation of various strategies, poor and minority students are not taught at higher rates than other students by inexperienced, unqualified, or out-of-field teachers.

Citation: NCLB §1112(c)(1)(L)
NCLB §1111(b)(8)(c)

Finding: The LEA does have three non-HQ teachers in a Title I school.

Corrective Action: The LEA should complete Highly Qualified Verification Forms and Action Plans for the three identified non-HQT and retain copies of those plans at the school office.

Monitoring Topic 9:

If the district has non-highly qualified teachers, what is the LEA doing to assist those teachers in becoming highly qualified, including teachers on emergency permits?

Citation: NCLB §2123(b)

Finding: The LEA does have non-HQT identified. No Title II, Part A funds were set aside to aid non-HQT in becoming HQ.

Corrective Action: The LEA should set aside some funds to aid non-HQT teachers in becoming HQ either by exam fees, tuition costs or other means where applicable.